

May 11, 2017

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On May 1<sup>st</sup> we were visited by Clifford Nelles for a RCRA audit. During the course of the audit Mr. Nelles found 1 item of concern. Please find our response to the finding below. Feel free to contact me with any questions or concerns.

1. Failure to keep a satellite accumulation container closed 40 CFR 262.34 (c)(1)(i), 265.173 (a) The open container was a drip pail, containing a removable lining that hold drips from wands that are used to pump out liquid from drums. Our current practice is to get rid of the pail liner after each shift so that the waste is removed from the pail twice daily. We have previously been unable to find lids for 5 gal pails that would allow the pail to be closed but also allow the wand to remain in the pail to catch the material dripping from the wand after use. Since Mr. Nelles' visit, the Site has cut a hole in the lids that fit snugly around the wand. This way the wand can continue to drip into the pail but the pail will remain closed. Pail liners will continue to be used and removed after each shift. Pictures of the new arrangement are included below.



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